

October 24th, 2016 Webinar – WIOA Policy and Practices Q & A

- 1. Can you address the requirements of multiple failed attempts at work in the community? Where does that fit into these requirements?**

We as rehabilitation professionals should continue to provide opportunities and services for the individual to work in competitive integrated employment. It doesn't matter how many attempts have failed we should continue to try and make a difference in the outcome. Things change and individuals should be given as many opportunities as are needed. The documentation from the failed attempts provide more information on what ideas, strategies and technologies, services and supports might change the outcome.

- 2. Can a CRP holding a 14 c certificate provide career exploration through prevoc to an individual who is being paid by that CRP? What about benefits planning provided by the CRP?**

Yes, but these service will not satisfy the requirement for providing Career Counseling or Information and Referral services that is required for all individuals who are earning subminimum wages.

- 3. Whose responsibility is it to educate parents and guardians on these?**

This is a shared responsibility among all members of an individual's team. The primary conversation would be initiated by the funding source who is overseeing and meeting with the individual on a regular basis.

- 4. Can a CRP with a 14c certificate continue to pay subminimum wages until 7/2017 while obtaining this required documentation?**

Yes.

- 5. Will the case managers have a resource page to obtain this information from?**

Yes. <http://www.ivrs.iowa.gov/cesframeset.html>

The logo for the Employment First Guidebook, featuring the text "Employment First" in blue and "Guidebook" in a lighter blue, set against a light green rectangular background.

- 6. What about people who reside in ICF/ID, they do not have case managers they have their MCO provider?**

People residing in an ICF/ID have a Qualified Intellectual Disability Professional (QIDP) responsible for coordinating the members Individual Program Plan (IPP). The QIDP is also responsible to review the member's IPP quarterly and make revisions as necessary. The Managed Care Organizations (MCO)s are required to have protocols and processes to work with the ICF/IDs to coordinate the provision of care for members residing in an ICF/ID.

- 7. So we first have to found out what the person and there guardian wants, then go to MCO to start process and start referral to IVRS. If they choose to stay at subminimum then IVRS will do what to meet that requirement for ICF/ID**

If the person chooses to stay in subminimum wage employment and they will not consider competitive integrated work, the case managers will continue to provide the counseling and information/referral and provide that documentation. If the individual decides they want to work in the community the individual should be referred to IVRS as well as case management.

- 8. If we fill out a referral, where can we send this?**

To the local IVRS office, which can be found on the IVRS website or in the information being sent out by LeAnn Moskowitz.

- 9. Can someone be making subminimum wage while working w/VR for CIE?**

Yes

- 10. Can you provide a summary of the IHH responsibility?**

The IHH is responsible to develop a person centered care plan for each individual that coordinates and integrates all of the member's clinical and non-clinical health-care related needs and services in coordination with the member's MCO and service providers.

The person centered plan for State Plan HCBS (Habilitation) members must meet the requirements outlined in 42 CFR 441.725

http://www.ecfr.gov/cgi-bin/text-idx?SID=1798d2febb63cabe2f3835734b3e5809&mc=true&node=pt42.4.441&rgn=div5#se42.4.441_1725

The person centered plan for the Children's Mental Health Waiver members must meet the requirements outlined in 42 CFR 441.301 (c) (1) - 441.301 (c) (3)

http://www.ecfr.gov/cgi-bin/text-idx?SID=1798d2febb63cabe2f3835734b3e5809&mc=true&node=pt42.4.441&rgn=div5#se42.4.441_1310

- 11. What does CRP stand for?**

Community Rehabilitation Provider.

- 12. What documentation does the MCO have that meets that requirement for WIOA and what specifically does the QMRP have to document indicating they are not ready for competitive employment.**

The MCO Community Based Case Manager would have a client record that contains the member's core standardized assessment, comprehensive person centered service plan, case notes, and prior authorization documents (as applicable).

The ICF/ID is responsible for all activities, including day programs, because the concept of active treatment is that all aspects of support and service to the individual are coordinated towards specific individualized goals in the IPP. The Qualified Intellectual Disability Professional (QIDP) documents in accordance with 42 CFR 483.440.

- 13. For people who are over 25 years old and receive HCBS services, should they still be referred to IVRS? I've been led to believe in the past few months that these services are being funded through HCBS.**

Yes, members should always be referred to IVRS for employment services.

- 14. Can the CRP provide education to meet requirements with the Case Manager present in a meeting?**

In order to meet the federal requirements, the member must receive Career Counseling and Information and Referral services from a qualified entity which does not have a financial interest in service provision.

- 15. Can we get a SOP as a CBCM?**

The Standard Operating Procedure (SOP) as a Community Based Case Manager is as follows:

The CBCM is responsible to develop a person centered care plan for each individual that coordinates and integrates all of the member's clinical and non-clinical health-care related needs and services in coordination with the member's MCO and service providers.

The person centered service plan for State Plan HCBS (Habilitation) members must meet the requirements outlined in 42 CFR 441.725.

http://www.ecfr.gov/cgi-bin/text-idx?SID=1798d2febb63cabe2f3835734b3e5809&mc=true&node=pt42.4.441&rgn=div5#se42.4.441_1725

The person centered plan for the HCBS Waiver members must meet the requirements outlined in 42 CFR 441.301 (c) (1) - 441.301 (c) (3).

http://www.ecfr.gov/cgi-bin/text-idx?SID=65747ce58da903c66571b45611266a37&mc=true&node=pt42.4.441&rgn=div5#se42.4.441_1301

- 16. You stated that someone can be making subminimum wage while working w/VR for CIE but what if they are not working with IVRS, but are making subminimum wage?**

If they are not working with IVRS, the CRP needs to make sure the documentation they have from the case manager meets the State Standard.

I think we are just asking our MCO to write up a standard operating procedure for this.

17. What are the ramifications for the individual refusing VR services?

The individual may not be accepted by a CRP into their program for subminimum wage employment. The CRP must meet certain documentation standards and if the case manager hasn't provided it, or the school fails to provide it, the CRP must pay minimum wage until they receive the documentation. IVRS counselors are educating families about this when they agree to meet with us.

18. We work with a few people who are funded through our county in a sub-minimum wage setting and do not have DHS or MCO involvement - who would provide the necessary documentation in these cases?

The county case manager is responsible for providing the documentation to you. They still must meet the State standards of documentation. You should not refer people to IVRS just for documentation as the first question from VR will be if you want all of your people in CIE. If you do we will open a case but we will need to make sure that services are timely and if you do not have the capacity to serve all of the individuals in CIE then IVRS will need to recruit other providers to serve them.

19. Will we receive a copy of the power point?

*Yes— it will be posted on the IVRS Internet link at this site:
<http://www.ivrs.iowa.gov/partners/CRPpage.html>*

20. Can the presenters introduce themselves?

Kenda Jochimsen, IVRS Bureau Chief, Brandy McOmber, IVRS Resource Manager, Lee Ann Russo, IVRS Resource Manager, LeAnn Moskowitz, IME Management Analyst.

21. Do we have until July 22, 2017 to provide appropriate documentation for individuals receiving subminimum wage? Or do we need to go back and pay minimum wage to individuals who don't have appropriate documentation yet?

You have until July 22, 2017 to provide documentation that individuals who are paid subminimum wages received Career Counseling & Information and Referral services from whomever is paying for their placement in your workshop; and that you referred these individuals for self-advocacy, self-determination and peer mentoring services in the community.